

# Exhibit F

**From:** [Abigail Carter](#)  
**To:** [Stephen Klein](#)  
**Cc:** [Mersino, Paul](#); [Joshua Rosenthal](#)  
**Subject:** RE: AFT MI v. Project Veritas - electronic copy of Weingarten subpoena  
**Date:** Thursday, January 30, 2020 3:23:59 PM

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Steve,

Thank you for sending a copy of the subpoena. I am continuing to represent AFT and President Weingarten in connection with this subpoena. Ms. Weingarten is not available on February 18. She will be out of town all that week in connection with Executive Council meetings.

More generally, however, it does not appear likely that Ms. Weingarten will have much information relevant to this particular case. She became aware of the facts underlying the case only after AFT Michigan discovered that Jorge was not who she purported to be. She received information about Jorge's activities at AFT Michigan only indirectly. Ms. Weingarten's name is not on many documents, and I understand that she has not been frequently mentioned in the depositions that have occurred. This reflects her degree of connection to this matter: one of many affiliate-related matters that she becomes aware of or comments on as leader of a 1.7-million member organization.

Moreover, it appears from your client's recent Twitter announcement, which includes footage from a previous videotaped deposition in this case, that your intention for this deposition is for a far different purpose than obtaining information relevant to this case. Given this, I am concerned that the motivation for this deposition is not to obtain information relevant to the claims and defenses in this case, but rather to seek out unrelated information and interfere with Ms. Weingarten's other activities.

Accordingly, in lieu of a deposition, we are offering to have Ms. Weingarten provide a declaration under oath that answers written questions of your choice (subject to our ability to object to such questions of course). In this way, we can be responsive to your subpoena and at the same time not impair Ms. Weingarten's other activities. Ms. Weingarten has an extremely active travel schedule to support AFT leaders and members around the country. When she is in the Washington, D.C. office, she has many demands on her time to support the staff at AFT in carrying out their mission.

Please let me know if this is acceptable.

Abigail

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**From:** Stephen Klein <steve@barrklein.com>  
**Sent:** Saturday, January 25, 2020 12:11 PM  
**To:** Abigail Carter <aacarter@bredhoff.com>; jrutter@aft.org  
**Cc:** Mersino, Paul <mersino@butzel.com>  
**Subject:** AFT MI v. Project Veritas - electronic copy of Weingarten subpoena

Abigail,

I write to confirm my new e-mail address and to provide you an electronic copy of the subpoena for deposition we served to Randi Weingarten yesterday in *AFT Michigan v. Project Veritas* in the event that you continue to represent AFT as a third party in this matter. If that is not the case, I have also included Jessica Rutter at AFT.

We're happy to work with you if the date of the deposition does not work and address any other questions or concerns. I'd appreciate electronic correspondence.

Regards,

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Steve Klein  
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